

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

CECELIA ROBERTS-WEBB, et al.,)	
Individually and on behalf of all other similarly)	
Situated individuals,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 4:16-cv-01703-CDP
)	
CITY OF MAPLEWOOD, MISSOURI,)	
)	
Defendant.)	

MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Plaintiffs and Class Representatives Cecelia Roberts-Webb, Frank Williams, Anthony Lemicy, and Logan Yates, on behalf of the Estate of Darron T. Yates, Deceased, by and through Class Counsel, hereby request this Court issue a final Order approving the terms of a proposed class action settlement. In support of this Motion, and for the reasons more fully set forth in the accompanying Memorandum of Law in Support, Plaintiffs state as follows:

1. The Court previously granted preliminary approval of the parties' proposed class settlement on November 1, 2022, finding the terms sufficiently fair, reasonable, and adequate to inform the class and proceed to a formal fairness determination. Dkt. No. 261. ("Order"). Pursuant to that Order, Plaintiffs now file this Motion for Final Approval of Class Action Settlement, asking that the Court grant final approval of the proposed settlement and enter the proposed form of judgment.

2. After negotiations, the Parties have reached a proposed settlement of this action. On or about October 18, 2022, the Parties executed a Class Action Settlement Agreement ("Settlement Agreement" or "Settlement"), a copy of which is attached hereto as Exhibit 1.

3. For the reasons set forth herein and in the attached Memorandum of Law in Support, the proposed settlement agreement between the Plaintiffs and the City of Maplewood is fair, reasonable, and adequate. The Settlement is the product of arm's length negotiations between Plaintiffs' counsel ("Class Counsel") and Defendant, City of Maplewood ("Maplewood").

4. The Settlement provides Class Members with substantial and immediate monetary relief and Maplewood with certainty and finality, while avoiding the inherent risks, delays, and expenses associated with continued, protracted class action litigation.

5. Accordingly, and consistent with the Memorandum of Law in Support, filed herewith, the Parties respectfully request that the Court grant final approval of the proposed settlement.

WHEREFORE, the Parties hereby move this Court for an Order and Judgment (1) approving the terms of the proposed class action settlement, (2) approving Class Counsel's application for an award of attorneys' fees and costs, and (3) entering a Final Approval Order and Judgment consistent with these findings.

Dated: February 17, 2023

Respectfully submitted,

By: /s/ Nathaniel R. Carroll
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Class Counsel

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on all counsel of record via this court's ECF/PACER electronic filing notification system on February 17, 2023.

/s/ Nathaniel R. Carroll